

IN THE DISTRICT COURT OF THE UNITED STATES
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

UNITED STATES OF AMERICA)	CRIMINAL NO.: 2:19-cr-918
)	
vs.)	18 U.S.C. § 208
)	
CLINTON KNIGHT)	
a/k/a Bo Knight)	<u>INFORMATION</u>
a/k/a Wayne Knight)	

THE ACTING U.S. ATTORNEY CHARGES:

Introduction

At all times relevant to this Information:

1. The Naval Health Clinic Charleston, formerly known as the Charleston Navy Hospital, was located on the Joint Base Charleston-Weapons Station in Charleston, South Carolina.
2. The Naval Health Clinic was a component of the United States Navy within the Department of Defense and provided a wide range of health services for service members, veterans, and their family members.
3. Beginning in or around 2004, through at least January 2018 (“the relevant time period”), the Defendant, **CLINTON “BO” KNIGHT**, was employed as the Information Management Department Head at the Naval Health Clinic, and was an employee of the executive branch of the United States Government.
4. In or about 2004, the Defendant, **CLINTON “BO” KNIGHT**, his wife Kathryn “Kathy” Knight, and others, both known and unknown to the United States, decided to form a

company, which they named TCMC, LLC (“TCMC”), to obtain contracts and subcontracts to perform information technology (“IT”) services for the United States government.

5. As a government employee, the Defendant, **CLINTON “BO” KNIGHT**, was required to submit forms disclosing potential conflicts of interest and any reportable assets or sources of income.

6. Every year from in or around 2004 through in or around 2018, TCMC acted as a subcontractor or prime contractor for the Naval Health Clinic’s IT services.

7. During the relevant time period, the Defendant, **CLINTON “BO” KNIGHT**, took actions as an employee at the Naval Health Clinic to cause contracts and subcontracts to be awarded to TCMC.

8. Specifically, in or about 2004, the Defendant, **CLINTON “BO” KNIGHT**, orchestrated a meeting with at least one representative of a government contractor to promote TCMC for an IT services contract.

9. Additionally, on at least one occasion in 2004, the Defendant, **CLINTON “BO” KNIGHT**, sent an email to an employee of a government contractor asking that they “retain the services of a local small business named TCMC, LLC.”

10. During the relevant time period, the Defendant’s wife, Kathryn “Kathy” Knight, was identified in TCMC’s payroll account in the “500-owners” department.

11. From in or around January 2012 through in or around January 2018, approximately \$320,888.00 in awarded government funds, identified as TCMC payroll, was deposited into an account maintained by the Defendant’s wife, Kathryn “Kathy” Knight.

12. At no point during the relevant time period did the Defendant, **CLINTON “BO” KNIGHT**, inform appropriate government officials responsible for awarding these government

contracts that he and his wife, the Defendant, KATHRYN “KATHY” KNIGHT, had a financial interest in TCMC.

COUNT 1

(Criminal Conflict of Interest: Acts Affecting a Personal Financial Interest)

13. Paragraphs 1 through 12 of this Information are hereby re-alleged.

14. Beginning in or around 2004 and continuing until in or around 2018, in the District of South Carolina and elsewhere, the Defendant, **CLINTON “BO” KNIGHT**, being an officer and employee of the executive branch of the United States Government, knowingly participated personally and substantially as a government officer and employee, through decision, approval, recommendation, and otherwise, in a determination and contract, in which, to Defendant’s knowledge, he and his wife, Kathryn “Kathy” Knight, had a financial interest.

All in violation of Title 18, United States Code, § 208.

/s/ M. Rhett DeHart

M. RHETT DEHART (AES)
ACTING UNITED STATES ATTORNEY